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> Sylvia Lesse Of Counsel

January 14, 2005

Via electronic filing

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: South Canaan Cellular Communications Company, LP

CC Docket No. 94-102

E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Order to Stay, South Canaan Cellular Communications Company, LP ("South Canaan") hereby submits updated information in support of its request for waiver of Section 20.18(d) of the Commission's Rules (filed August 1, 2003). As indicated by the additional information provided herein, the public interest will be served by grant of the requested relief.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,

Counsel for South Canaan

Cellular Communications Company, LP

David Solomon, Chief, Enforcement Bureau
D'wana Terry, Chief, Public Safety & Critical Infrastructure Division
Stanley Wiggins, Public Safety & Critical Infrastructure Division
Best Copy & Printing, Inc.
Mr. Bernie Swartwood, Pike County Communications

See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

# SOUTH CANAAN CELLULAR COMMUNICATIONS COMPANY, LP. E911 PHASE II INTERIM IMPLEMENTATION REPORT FOR TIER III CARRIERS

#### Fourth Quarter, 2004

South Canaan Cellular Communications Company, L.P. ("South Canaan" or "Company"), pursuant to the Commission's Order to Stay, hereby provides an interim report to assist the Commission in monitoring South Canaan's progress in deploying Phase II E911 technology.<sup>2</sup>

# I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

South Canaan's status with respect to Phase I and Phase II requests from PSAPs remains unchanged. South Canaan has received a valid Phase I request from Pike County and provides Phase I service to this county. South Canaan has also received a valid Phase II request from Pike County, and is continuing to work with Pike County to provide the requested Phase II service. Please see the attached acknowledgement from the Pike County Communications Officer noting its agreement with South Canaan's projected compliance date of February 15, 2005. The Company has not received a Phase I or a Phase II request from the other county it serves, Wayne County.

#### II. The carrier's specific technology choice:

The Company continues to report that a network-based Phase II solution is not economically or technically feasible and that it has no alternative but to convert its analog system to a CDMA network that supports a handset-based solution.

### III. Status on ordering and/or installing necessary network equipment:

As previously reported, the Company has purchased and installed upgrades to its Lucent switch so that it will now support digital signals.<sup>3</sup> As noted in its December, 2004 supplemental interim report, the Company reports has completed the digital conversion of its fifth cell site in Pike County, and currently anticipates that digital conversion of the last site, Ledgedale, will be completed by February 15, 2005, and that all ancillary arrangements for support functionality will also be in place at that time.

See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

On August 1, 2003, South Canaan requested a limited and temporary waiver of the Commission's Phase II obligations ("Petition") and filed an E911 Phase II Interim Report for Tier III Carriers ("First Report"). In its Petition, South Canaan committed to providing quarterly progress reports. On November 10, 2003, South Canaan supplemented the Petition with updated information to further substantiate its request. See Supplement to Petition for Wavier of Section 20.18 of the Commission's Rules, CC Docket No. 94-102, filed Nov. 10, 2003 ("Supplement"). The Company filed progress reports on January 15, April 15, July 15, 2004, and an interim report in December, 2004. The instant report serves as the Company's seventh progress report.

See Supplement at 2.

In addition to the education and marketing campaign described in South Canaan's December, 2004 supplemental interim report, the Company plans to initiate an aggressive campaign aimed at encouraging existing analog customers to convert to digital handsets. The Company plans to offer free as well as heavily-discounted compliant handsets in conjunction with analog subscribers accepting a new 2-year agreement. Together with direct mail promotions emphasizing the additional features and benefits available through these handsets, the Company anticipates that this aggressive marketing campaign will enable it to meet the 95% benchmark by the close of 2007

### IV. Information Regarding Availability of ALI-Capable Handsets

As noted in its December, 2004 supplemental interim report, the Company currently sells only ALI-compliant phones, currently offering nine different models of ALI-capable handsets.

# V. The estimated date on which Phase II service will first be available in the carrier's network:

South Canaan anticipates that Phase II service will first become available within the next two weeks in all Pike County sites but one, and will be available on a county-wide basis by the middle of February, 2005.



## South Canaan Cellular Investments, LLC

564 Spring Onlin Brive West Chester, PA 19883

January 13, 2005

d Committee ga C. Copp et R. Marrie ol E. Please

Mr. Bernie Swertwood Director of Communications Plus County Communications Center 506 Broad Street Milford PA 18337 570-298-1911

Dear Mr. Swartwood,

This tetter is to confirm our mutual understanding and agreement with respect to South Canada Cellular Communication Co.'s deployment of E911-Phase II capabilities throughout its network in Pilos County, PA.

The Pile County Communications Center and South Centern Cellular, through its representative, V-Comm Telecommunications Engineering, have been working closely for a period of time to monitor and accomplish, respectively, implementation of Phase II functionality. The Pike County PSAP administrator acknowledges and accepts a achedule for completion which contemplates completion on or about February 15, 2005, when the cellular site in Ledgedale. PA is appraised to offer digital service. Phase II capability is anticipated to be in place and tested prior to upgrading this last site.

Please confirm your agreement with the contents of this letter by signing in the signature block below and returning to me via faceinile at 810-429-9939. Enclosed is a self-addressed envelope so you can return the original to me by mail. Thank you.

Sincerely,

Carolyn Copp **President** SCCI, LLC

peneral partner

South Canash Cellular Communications Co., LP

carolyncopp@att.net

510-429-0563 610-429-9939 fax

Acknowledged and Agreed:

A Rand Suntino

Date: 1/14/05

#### **DECLARATION OF CAROLYN C. COPP**

I, Carolyn C. Copp, President of SCCI, LLC, the General Partner of South Canaan Cellular Communications Company, L.P., do hereby declare under penalty of perjury that I have read the foregoing "E911 Phase II Interim Implementation Report for Tier III carriers, Fourth Quarter, 2004" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

14 gas 2005

Canolyn C. Copp